



Kansas Department of Health and Environment
Bureau of Air and Waste Management
Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/ Transporter Compliance Inspection Report

General

Time 10:00a.m. Date Dec. 17, 1990
Facility Name Olin Water Services EPA ID No. KSD0000203638
Street 3155 Fiberglass Road City Kansas City, KS Zip 66115
Mailing Address (if different than above) _____
County Wyandotte Phone (913) 621-6440
Contact(s) Mr. Willaim Dame - Plant Manager
Inspector(s) Jim Fischer - Lynda Ramsey
Type of Business Industrial Water Treatment Formulator
Has the company declared any information/processes as trade secrets (K.S.A. 65-3447)? Yes No
If yes, explain. _____

Industrial Wastes Generated

(List hazardous wastes first)

SEE ATTACHED LIST



R00146069

RCRA RECORDS CENTER

Waste:		
If waste is hazardous, give H.W. ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:		

Waste:		
If waste is hazardous, give H.W. ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:		

- I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (K.A.R. 28-31-4(b)) ☒ Yes No
- A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (K.A.R. 28-31-4(f)) ☒ Yes No NA
- B. If waste(s) was tested, are the results kept for three years? (K.A.R. 28-31-4(f)(1)(c))? ☒ Yes No NA
- II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW) has written permission been obtained from the operator of the POTW? (K.A.R. 28-31-3/40 CFR 261.4) Yes No ☒ NA
- III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (K.A.R. 28-29-23) Yes No ☒ NA
- A. If yes, list the authorization number(s):

IV. Facility size classification:

- ☒ Not a Gen. ☐ Small Qt. Gen. ☐ Ks. Gen. ☐ EPA Gen.
- ☒ T/S/D Facility ☐ Transporter ☐ H.W. Burner/Marketer ☐ Used oil Burner/Marketer

Hazardous Waste Determination Requirements:

☒ Adequate ☐ Inadequate

Notification Requirements

- V. Has generator Notified KDHE and obtained an EPA Identification Number? (K.A.R. 28-31-4(c)) ☒ Yes No NA
- VI. Is current Notification accurate? (K.A.R. 28-31-4(e))
- A. Is this facility marketing (selling) hazardous waste as a fuel? ☒ Yes No NA
- B. Is this facility marketing (selling) used oil as a fuel? (If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.) ☒ Yes ☒ No NA
- C. Is this facility burning hazardous waste as a fuel? Yes ☒ No NA
- D. Is this facility burning used oil as a fuel? Yes ☒ No NA

Notification Requirements:

☒ Adequate ☐ Inadequate ☐ NA

(If small quantity generator, stop here.)

Manifests

VII.	Is a contractual agreement used in place of manifesting? (K.A.R. 28-31-4(c))	Yes	<input checked="" type="radio"/> No	
A.	If yes, does the contractual agreement include the type of waste and frequency of shipments?	Yes	No	
B.	If yes, is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	Yes	No	
C.	If yes, is a copy of the agreement kept for a period of three years after termination of agreement?	Yes	No	NA
VIII.	Is a current manifest showing revision date and burden disclosure statement used? (K.A.R. 28-31-4(d)/40 CFR 262.20)	Yes	No	NA
A.	If yes, does manifest(s) include:			
1.	Generator EPA Identification Number (twelve digit) and manifest document number (five digit)?	<input checked="" type="radio"/> Yes	No	NA
2.	Number of pages?	<input checked="" type="radio"/> Yes	No	
3.	Generators name and mailing address?	<input checked="" type="radio"/> Yes	No	
4.	Generators phone number?	<input checked="" type="radio"/> Yes	No	
5.	Transporter 1 Name?	<input checked="" type="radio"/> Yes	No	
6.	Transporter 1 EPA Identification Number?	<input checked="" type="radio"/> Yes	No	
7.	Transporter 2 Name?	Yes	No	<input checked="" type="radio"/> NA
8.	Transporter 2 EPA Identification Number?	Yes	No	<input checked="" type="radio"/> NA
9.	Name and site address of designated facility?	<input checked="" type="radio"/> Yes	No	
10.	Designated facility's EPA Identification Number?	<input checked="" type="radio"/> Yes	No	
11.	Waste Description (DOT shipping name, hazard class, and Identification Number)?	<input checked="" type="radio"/> Yes	No	
12.	Number and type of containers?	<input checked="" type="radio"/> Yes	No	
13.	Total Quantity?	<input checked="" type="radio"/> Yes	No	
14.	Unit (weight or volume)?	<input checked="" type="radio"/> Yes	No	
15.	Special handling instructions?	Yes	No	<input checked="" type="radio"/> NA
16.	Generators certification including waste minimization statement, generators signature and date?	<input checked="" type="radio"/> Yes	No	
17.	Name, signature and date of transporter 1?	<input checked="" type="radio"/> Yes	No	
18.	Name, signature and date of transporter 2?	Yes	No	<input checked="" type="radio"/> NA
B.	Does generator retain a copy of manifest(s) signed by both generator and transporter? (K.A.R. 28-31-4(d)/40 CFR 262.23)	<input checked="" type="radio"/> Yes	No	
C.	Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (K.A.R. 28-31-4(f)(1)(A))	<input checked="" type="radio"/> Yes	No	
D.	Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	Yes	<input checked="" type="radio"/> No	
1.	If Yes, was exception report(s) filed? (K.A.R. 28-31-4(f)(4))	Yes	No	<input checked="" type="radio"/> NA
2.	If Yes, was copy retained for 3 years? (K.A.R. 28-31-4(f)(1)(B))	Yes	No	<input checked="" type="radio"/> NA

Manifesting Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Land Disposal Restrictions Requirements

- IX. Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C? ☒ Yes ☐ No
List these wastes:
- A. FOOL D. _____
B. _____ E. _____
C. _____ F. _____
- X. Is the waste(s) covered by a National Variance(s), Extension, or Petition? (40 CFR 268 5&6) ☐ Yes ☐ No
A. If Yes, describe the variance, extension, or petition which applies:

- XI. Is the waste covered by an exemption? (40CFR 268.1(c)(3)) ☐ Yes ☐ No
A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? (40CFR 268.7(a)(3)) ☐ Yes ☐ No
- XII. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? ☒ Yes ☐ No
A. If Yes, does the generator provide a Notification to the T/S/D facility that includes: EPA hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40CFR 268.7) ☒ Yes ☐ No
B. If yes, is a copy of this notification kept for 5 years? ☒ Yes ☐ No
- XIII. Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If Yes, fill out land disposal restrictions checklist.) ☐ Yes ☒ No

Land Disposal Restrictions Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Pre-Transport Requirements

- XIV. Does generator package waste in accordance with DOT requirements? (K.A.R. 28-31-4(e)(1)) ☒ Yes ☐ No ☐ NA
- XV. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (K.A.R. 28-31-4(e)(2)) ☒ Yes ☐ No ☐ NA
- XVI. Does generator mark (consignee's or consignor's name and address, etc) on each package in accordance with DOT requirements of 40 CFR 172 Subpart D? (K.A.R. 28-31-4(e)(3)) ☒ Yes ☐ No ☐ NA
A. Does generator mark each container of 110 gallons or less as below? (K.A.R. 28-31-4(e)(3)) ☒ Yes ☐ No ☐ NA

Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the U.S. EPA.

Generator's Name and Address

Manifest Document Number

- XVII. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? (K.A.R. 28-31-4(e)(4)) Yes ☒ No ☐ NA ☐
- XVIII. Does generator only use a transporter who is properly registered with the department? (K.A.R. 28-31-4(g)) Yes ☒ No ☐ NA ☐

Pre-Transport Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Biennial Reports

- XIX. Has generator submitted a biennial report(s) to KDHE? (K.A.R. 28-31-4(f)(2)) Yes ☒ No ☐ NA ☐
- A. If Yes, does generator retain copies for three years? (K.A.R. 28-31-4(f)(1)(B)) Yes ☒ No ☐ NA ☐

Biennial Report Requirements: ☒ Adequate ☐ Inadequate

Special Conditions

- XX. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E) Yes ☐ No ☒
- A. If Yes, has generator filed a Notice with the Secretary of Health and Environment? Yes ☐ No ☒ NA ☐
- B. Is waste manifested and signed by a foreign consignee? Yes ☐ No ☒ NA ☐
- C. If generator transports wastes out of the country, has confirmation of delivered shipment been received? Yes ☐ No ☐ NA ☐

Special Conditions Requirements: ☒ Adequate ☐ Inadequate ☐ NA

Storage Requirements

- XXI. Does generator temporarily store waste before transport? Yes ☒ No ☐
- A. For 90 days or less? Yes ☐ No ☐ NA ☐
- B. For more than 90 days? Yes ☒ No ☐ NA ☐
- C. If waste is stored in containers:
1. Are containers marked with the words: "Hazardous Waste"? (K.A.R. 28-31-4(g)(3) or (h)(1)(D)) Yes ☒ No ☐ NA ☐
 2. Is the accumulation start date marked on each containers? (K.A.R. 28-31-4(g)(2) or (h)(1)(C)) Yes ☒ No ☐ NA ☐
 3. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (K.A.R. 28-31-4(g)(1) or (h)(1)(B)) Yes ☒ No ☐ NA ☐
 4. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? (K.A.R. 28-31-4(k)) Yes ☒ No ☐ NA ☐
 - a. If Yes, are these inspections documented in a log that includes date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? (K.A.R. 28-31-4(d)/40 CFR 265.15(d)) Yes ☒ No ☐ NA ☐

5. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (K.A.R. 28-31-4(g)(1)) *HAS VARIANCE* Yes ☒ No NA
6. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (K.A.R. 28-31-4(g)(1) or (h)(1)(B)) ☒ Yes No NA
7. Does generator have any satellite storage areas? (K.A.R. 28-31-4(j)) ☒ Yes No NA
- If yes,
- a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste? ☒ Yes No
- b. Is the container in good condition and closed except to add or remove waste? ☒ Yes No
- c. Is the container marked with the words: "Hazardous Waste"? ☒ Yes No
- d. Is the container marked with the accumulation start date at the time it becomes full? ☒ Yes No
- e. Is the full container moved to the storage area within 3 days after it became full? ☒ Yes No

(If waste(s) is placed in tanks, piles, or surface impoundments complete the appropriate inspection checklist.)

Storage Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Kansas Generator's Emergency Preparedness

- XXII. Has facility named one employee as emergency coordinator? (K.A.R. 28-31-4(h)(1)(E)) Yes No
- A. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? Yes No
- B. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? Yes No
- C. Is the emergency coordinator familiar with the reporting requirements of K.A.R. 28-31-4(h)(2)? Yes No
- XXIII. Is the following information posted next to at least one telephone which is immediately accessible in an emergency: (K.A.R. 28-31-4(h)(1)(F))
- A. Name and telephone of emergency coordinator? Yes No
- B. Location of fire extinguishers, fire alarms, or spill control material, if available? Yes No
- C. Telephone number of fire department unless the facility has a direct alarm? Yes No NA
- XXIV. Have employee's been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? (K.A.R. 28-31-4(h)(1)(G)) Yes No
- A. Is this training documented in any way? Yes No

Kansas Generator's Emergency Preparedness Requirements:

☐ Adequate

☐ Inadequate

☐ NA

(If Kansas generator, stop here.)

Preparedness and Prevention

XXV. If appropriate, based upon the nature and quantity of wastes generated and stored at the facility, is the facility equipped with:

- | | | | |
|--|--------------------------------------|----|----|
| A. Internal communication or alarm system easily accessible in case of emergency?
(K.A.R. 28-31-4(g)(4)/40 CFR 265.32(a)) | <input checked="" type="radio"/> Yes | No | NA |
| B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(b)) | <input checked="" type="radio"/> Yes | No | NA |
| C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(c)) | <input checked="" type="radio"/> Yes | No | NA |
| D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (K.A.R. 28-31-4(g)(4)/40 CFR 265.32(d)) | <input checked="" type="radio"/> Yes | No | NA |
| E. Is this equipment (A-C above) tested and maintained to assure its proper operation?
(K.A.R. 28-31-4(g)(4)/40 CFR 265.33) | <input checked="" type="radio"/> Yes | No | NA |

XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (K.A.R. 28-31-4(g)(4)/40 CFR 265.35)

☒ Yes No NA

XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

- | | | | |
|---|--------------------------------------|----|-------------------------------------|
| A. Familiarized the local emergency authorities with the facility, wastes handled, entrances and exits? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(1)) | <input checked="" type="radio"/> Yes | No | NA |
| B. Designated one authority where one or more police or fire departments might respond to an emergency? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(2)) | <input checked="" type="radio"/> Yes | No | NA |
| C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(3)) | Yes | No | <input checked="" type="radio"/> NA |
| D. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(4)) | <input checked="" type="radio"/> Yes | No | NA |

XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (K.A.R. 28-31-4(g)(4)/40 CFR 265.37(a)(b))

Yes No ☒ NA

Preparedness and Prevention Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Personnel Training

XXIX. Has the owner/operator established a hazardous waste management training program? (K.A.R. 28-31-4(g)(4)/40 CFR 265.16)

☒ Yes No

- | | | |
|--|--------------------------------------|----|
| A. Is the program directed by a person trained in hazardous waste management?
(40 CFR 265.16(a)(2)) | <input checked="" type="radio"/> Yes | No |
| B. Are new personnel trained within six months after their employment?
(40 CFR 265.16(b)) | <input checked="" type="radio"/> Yes | No |
| C. Are new employees supervised until training is completed?
(40 CFR 265.16(b)) | <input checked="" type="radio"/> Yes | No |
| D. After initial training, are employees trained on an annual basis?
(40 CFR 265.16(c)) | <input checked="" type="radio"/> Yes | No |

E. Does the facility maintain the following documents and records:

1. Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1) & (2))
2. Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3))
3. Records of training given to facility personnel? (40 CFR 265.16(d)(4))

Yes No
Yes No
Yes No

Personnel Training Requirements:

☒ Adequate

☐ Inadequate

Contingency Plan

XXX. Does the facility have a contingency plan? (K.A.R. 28-31-4(g)(4)/40 CFR 265 Subpart D)
If yes,

Yes No

- A. Does the plan list the names(s), home address, and phone numbers of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d))
will update List - Minor Permit mod.
- B. Is an emergency coordinator available at all times? (40 CFR 265.55)
- C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a))
- D. Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c))
- E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e))
- F. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f))
- G. Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53)

Yes No
Yes No
Yes No
Yes No
Yes No
Yes No
Yes No

Contingency Plan Requirements:

☒ Adequate

☐ Inadequate

(If EPA generator, stop here.)

<u>EPA Hazardous Waste No.</u>	<u>Waste Material</u>	<u>Quantity/Month</u>	<u>Method of Disposal</u>
D001	Lab Solvents	Varies	Safety-Kleen Corporation
D002	" " "		
D003	" " "		
D007	" " "		
D009	Mercury	Not generated on regular basis	Chemical Waste Management
F001	Methylene Chloride	Varies/Lab Waste	Pick up by Safety-Kleen Corporation

SUMMARY

The basic operation of the facility remains as noted in previous inspection reports.

Since December 1990, the generator discontinued the use of chrome bearing corrosion inhibitors in water treatment chemicals, therefore, chrome contaminated waste is not generated on a regular basis. However, some reworkable product may be received from customers that may result in the generation of chromium contaminated waste.

The generator acquired the building formerly occupied by Grief Container Corporation for use as additional warehouse space. This building adjoined Olin's existing warehouse.

Violations

1. Self explanatory

Note: On the day following the inspection I notified Mr. Dame that changes in the Emergency Contingency Plan require a Class I permit modification and that these changes must be reviewed/approved by the hazardous waste section.



State of Kansas

Mike Hayden, Governor

Department of Health and Environment

Northeast District Office

Stanley C. Grant, Ph.D., Secretary

808 W. 24th Street, Lawrence, Kansas 66046-4417

(913) 842-4600

RCRA Compliance Inspection Report

T/S/D Facilities Checklist

A. General

Date December 17, 1990 Time 10:00 a.m. EPA ID No. KSD000203638

Facility Name Olin Water Services

Street 3155 Fiberglass Road

City Kansas City, Kansas Zip 66115

County Wyandotte Phone 913-621-6440

Contact William Dame - Plant Manager

Inspector Jim Fischer - Lynda Ramsey

Other _____

B. Activity at Site

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
<input type="checkbox"/> Chem/Phys/Bio Treatment	<input checked="" type="checkbox"/> Drums	<input type="checkbox"/> Incineration
<input type="checkbox"/> Filtration	<input type="checkbox"/> Pile	<input type="checkbox"/> Landfill
<input type="checkbox"/> Incineration	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Tank, Above ground	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Reprocessing	<input type="checkbox"/> Tank, Below ground	<input type="checkbox"/> Other ()
<input type="checkbox"/> Solvent Recovery	<input type="checkbox"/> Other ()	
<input type="checkbox"/> Thermal Treatment		
<input type="checkbox"/> Volume Reduction		
<input type="checkbox"/> Waste Oil		
<input type="checkbox"/> Other ()		

Comments: _____

C. Waste Analysis Plan

265.13

1. Does facility maintain a copy of its waste analysis plan at the facility?

☒ YES ☐ NO

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters.

☒ YES ☐ NO

2. Test methods which are used to test for these parameters.

☒ YES ☐ NO

3. Sampling method used to obtain sample.

☒ YES ☐ NO

4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current.

☒ YES ☐ NO

5. For off-site facilities, the waste analyses that generators have agreed to supply.

YES ☐ NO ☒ NA

6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest.

YES ☐ NO ☒ NA

Waste analysis plan requirements:

☒ Adequate ☐ Inadequate

D. Security

265.14

1. Does the facility provide either of the following:

- a. A 24-hour surveillance system? (T.V. monitoring or guards).

YES ☒ NO

- b. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, T.V. monitoring, locked entrance, controlled roadway access).

☒ YES ☐ NO

2. Does the facility provide warning signs at entrances. ☒ YES ☐ NO
3. Does the facility consider itself exempt from security requirements? YES ☒ NO

Security requirements:

☒ Adequate ☐ Inadequate ☐ Not Applicable

E. General Inspection Requirements

265.15

1. Does the owner/operator maintain a written schedule at the facility for inspecting:
- a. Monitoring equipment ☒ YES ☐ NO
 - b. Safety and emergency equipment ☒ YES ☐ NO
 - c. Security devices ☒ YES ☐ NO
 - d. Operating and structural equipment ☒ YES ☐ NO
2. Does the inspection schedule identify the types of problems which are to be looked for during the inspections? ☒ YES ☐ NO
3. Does the owner/operator maintain an inspection log? ☒ YES ☐ NO
- a. If yes, does the log contain the:
- 1. Date and time of inspection ☒ YES ☐ NO
 - 2. Name of inspector ☒ YES ☐ NO
 - 3. Notation of observations ☒ YES ☐ NO
 - 4. Date and nature of repairs or remedial action ☒ YES ☐ NO

Inspection requirements:

☒ Adequate ☐ Inadequate

F. Personnel Training

265.16

1. Does the owner/operator maintain at the facility, the following documents and records:

- a. Job title and job description for each position related to hazardous waste management. ☒ YES ☐ NO
- b. Description of type and amount of training to be given each person. ☒ YES ☐ NO
- c. Records of training given to facility personnel. ☒ YES ☐ NO

Personnel training requirements:

☒ Adequate ☐ Inadequate

G. Requirements For Ignitable, Reactive, or Incompatible Wastes

- 265.17
- 1. Does the facility handle ignitable or reactive wastes? ☒ YES ☐ NO
 - a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? ☒ YES ☐ NO ☐ NA
 - 2. Are smoking and open flames confined to specially designated locations? ☒ YES ☐ NO ☐ NA
 - 3. Are "No Smoking" signs posted in hazard areas? ☒ YES ☐ NO ☐ NA
 - 4. Does a check of these areas show any leakage or corrosion of containers? YES ☒ NO ☐ NA
 - 5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes? ☒ YES ☐ NO ☐ NA

Ignitable, reactive, or incompatible waste requirements:

☒ Adequate ☐ Inadequate ☐ Not Applicable

H. Preparedness and Prevention

- 265.31
- 1. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES ☒ NO ☐
- 265.32
- 2. If applicable to the facility, is the facility equipped with:
 - a. Internal communication or alarm system easily accessible in case of emergency? ☒ YES ☐ NO ☐ NA
 - b. Telephone, hand-held two-way radio capable of summoning emergency response personnel? ☒ YES ☐ NO ☐ NA

- | | | | | |
|--------|---|--------------------------------------|--------------------------|-------------------------------------|
| | 3. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | 4. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.33 | 5. Is this equipment (1-4 above) tested and maintained to assure its proper operation? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.35 | 6. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.37 | 7. If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | 8. In areas where more than one police and fire department might respond, is there one designated authority? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| | 9. If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| | 10. If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | 11. In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |

Preparedness and prevention requirements:

☒ Adequate ☐ Inadequate

I. Contingency Plan and Emergency Procedures

- | | | | |
|--------|---|--------------------------------------|--------------------------|
| 262.53 | 1. Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services? | <input checked="" type="radio"/> YES | <input type="radio"/> NO |
| 262.52 | 2. Does the plan describe arrangements made with emergency response personnel? | <input checked="" type="radio"/> YES | <input type="radio"/> NO |

- 265.73
- a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? YES NO ☒ NA
1. If no, was the Regional Administrator notified? YES NO ☒ NA
4. Does the owner/operator keep a written operating record at the facility? ☒ YES NO
- a. If yes, does the operating record include:
1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? YES NO ☒ NA
2. The location of each hazardous waste within the facility and the quantity at each location? ☒ YES NO NA
3. Records and results of waste analyses? ☒ YES NO NA
4. Reports and details of incidents requiring implementation of the contingency plan? YES NO ☒ NA
5. Records and results of required inspections? ☒ YES NO NA
6. Monitoring, testing, or analytical data? ☒ YES NO NA
7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? ☒ YES NO NA
- 265.76
5. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? YES NO
- a. If yes, was an unmanifested waste report submitted to the Regional Administrator? YES NO ☒ NA

Manifest system, recordkeeping, and reporting requirements:

[] Adequate [] Inadequate

K. Closure and Post-Closure

- 265.112
1. Does the owner/operator have a written closure plan for the facility? ☒ YES NO
- a. If yes, does the plan include:
1. A description of how and when the facility will be closed? ☒ YES NO

2. A description of the steps necessary to completely close the facility? ☒ YES ☐ NO
3. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? ☒ YES ☐ NO
4. A description of the steps needed to decontaminate facility equipment at the time of closure? ☒ YES ☐ NO
5. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? ☒ YES ☐ NO

265.118

2. If the facility is a disposal facility, does the owner/operator have a written post-closure plan? YES ☐ NO ☒ NA
 - a. If yes, does the plan include:
 1. Ground-water monitoring activities and frequencies at which they will be performed? YES ☐ NO ☒ NA
 2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? YES ☐ NO ☒ NA
 3. The name, address, and phone number of the person or office to contact during the post-closure period? YES ☐ NO ☒ NA

Closure and post-closure requirements:

☒ Adequate ☐ Inadequate

L. Financial Requirements

- 265.142 1. Does the owner/operator have a written estimate of the closure cost? ☒ YES ☐ NO
- 265.143 2. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82). ☒ YES ☐ NO
- 265.144 3. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? ☒ YES ☐ NO ☒ NA

265.145

4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82)

YES NO NA

265.147

5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82).
6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)

YES NOYES NO NA

Financial requirements:

☒ Adequate ☐ Inadequate

M. Management of Containers

265.170

1. Are containers presently used to store hazardous waste? YES NO
- a. If no, do not complete questions 2-5.
- b. If yes, check condition of containers and for evidence of incompatibility of waste with containers.

Condition of Containers:

☒ Adequate ☐ Inadequate ☐ Not Applicable

265.173

2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?

YES NO NA

265.174

3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?

YES NO NA

4. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? VARIOUS

5. If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from the other materials by means of a dike, berm, wall, or other device?

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